

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.: 11-
CHI-WON JEON : Title 18, United States Code,
Sections 371, 1028A, and 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Conspiracy to Unlawfully Produce Identification Documents and to Commit Credit Card Fraud)

Introduction

1. At all times relevant to this Information:
 - a. Defendant CHI-WON JEON was a resident of Bergen County, New Jersey.
 - b. Co-Conspirator S.H.P., an individual not named as a defendant herein, operated a criminal enterprise in Bergen County, New Jersey (hereinafter the "Criminal Enterprise") that engaged in identity theft and various types of fraud.
 - c. Co-Conspirator Y.H.J., a resident of Closter, New Jersey, was an illegal document broker for the Criminal Enterprise.

Overview of the Criminal Enterprise

2. The Criminal Enterprise fraudulently obtained and sold social security cards to customers. These social security cards began with the prefix "586," which prefix the United States government typically used on social security cards issued to individuals, usually from China, who worked in American territories. The Criminal Enterprise and the customer then used the "586" social security cards either to obtain a genuine but fraudulently issued driver's license or produce a counterfeit driver's license (hereinafter collectively the "Fraudulent Identity").

3. After providing the Fraudulent Identity to the customer, the Criminal Enterprise engaged in the fraudulent "build up" of the credit score associated with that identity. This "credit build up" was accomplished by taking the Fraudulent Identity and attaching it to other co-conspirators' credit card accounts. By attaching the Fraudulent Identity to these credit card accounts, the Fraudulent Identity obtained a perfect or near perfect credit score. The Criminal Enterprise charged the customer a fee of between approximately \$5,000 and \$7,000 for the Fraudulent Identity and the corresponding credit build up.

4. Thereafter, the Criminal Enterprise directed, coached, and assisted the customer to use the Fraudulent Identity to open bank accounts and apply for loans and credit cards. The

Criminal Enterprise and the customer then profited by using the fraudulently obtained credit cards to obtain merchandise, money, and other things of value.

The Conspiracy

5. From in or around September 2007 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

CHI-WON JEON

knowingly and intentionally conspired and agreed with S.H.P., Y.H.J., and others to commit offenses against the United States, namely:

(a) unlawfully producing identification documents, contrary to Title 18, United States Code, Sections 1028(a)(1) and 1028(c)(3)(A); and

(b) using, with intent to defraud, one or more unauthorized access devices during a one year period for the purpose of obtaining things of value of \$1,000 or more, contrary to Title 18, United States Code, Section 1029(a)(2).

Objects of the Conspiracy

6. The objects of the conspiracy were for defendant CHI-WON JEON and her co-conspirators to unlawfully enrich themselves by: (a) unlawfully producing Fraudulent Identities; and (b) using the Fraudulent Identities to obtain credits cards for the purpose of obtaining merchandise, money, and other things of value to which they were not entitled.

Manner and Means of the Conspiracy

7. It was part of the conspiracy that defendant CHI-WON JEON purchased and obtained from Co-Conspirator Y.H.J. two "586" social security cards in the names of individuals with the initials X.L. and F.J., respectively, who were actual persons.

8. It was further part of the conspiracy that defendant CHI-WON JEON used the X.L. and F.J. identities to obtain genuine but fraudulently issued driver's licenses.

9. It was further part of the conspiracy that the Criminal Enterprise fraudulently "built-up" the credit score related to the X.L. and F.J. identities.

10. It was further part of the conspiracy that defendant CHI-WON JEON and members of the Criminal Enterprise, including Co-Conspirator Y.H.J., used the X.L. and F.J. identities to open bank accounts and obtain loans and credit cards in those identities. In total, the Criminal Enterprise and defendant CHI-WON JEON caused losses in excess of \$200,000 to various banks, lenders, and credit card companies as a result of their scheme.

Overt Acts

11. In furtherance of the conspiracy and in order to effect the objects thereof, defendant CHI-WON JEON and her co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. On or about September 25, 2007, defendant CHI-WON JEON obtained a driver's license from the Illinois Department of Vehicle Services in the name of X.L.

b. On or about September 19, 2008, defendant CHI-WON JEON obtained a driver's license from the Pennsylvania Department of Transportation in the name of F.J.

c. In or about November 2008, defendant CHI-WON JEON applied for and obtained a credit card from Macy's under the name F.J.

d. On or about January 8, 2009, defendant CHI-WON JEON used a Macy's credit card in the name of F.J. to purchase approximately \$9,000 worth of diamonds.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(Aggravated Identity Theft)

1. The allegations set forth in Paragraphs 1 through 4 and Paragraphs 6 through 11 of Count One of this Information are hereby realleged as if fully set forth herein.

The Charge

2. From in or around September 2007 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

CHI-WON JEON

knowingly transferred, possessed, and used, without lawful authority, the means of identification of other persons, namely, X.L. and F.J., during and in relation to violations of federal law, namely, unlawfully producing identification documents (18 U.S.C. § 1028(a)(1)) and credit card fraud (18 U.S.C. § 1029).

In violation of Title 18, United States Code, Section 1028A and Section 2.

PAUL J. FISHMAN
United States Attorney